

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOANNE HART and SANDRA BUENO, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

BHH, LLC d/b/a Bell + Howell and VAN HAUSER
LLC

Defendants.

Civil Action No. 1:15-CV-04804-
WHP

**NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that upon: (1) the accompanying Memorandum of Law, and (2) the Declaration of Yitzchak Kopel, and the Exhibits attached thereto (including the Parties' Stipulation of Settlement), Plaintiffs, through their undersigned attorneys, will move this Court, before the Honorable William H. Pauley, United States District Court Judge, Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for an Order, pursuant to Federal Rule of Civil Procedure 23(e), to: (1) grant preliminary approval of the Settlement; (2) approve the Claims Administrator; (3) approve and authorize the contents and distribution of the Settlement Notice; (4) approve and authorize the procedures for submitting Objections and Requests for Exclusion and the binding nature thereof; (5) set deadlines for submitting papers in support of the Motion for Final Approval, the Motion for Attorneys' Fees, Costs, and Expenses and Class Representative Incentive Awards, and any responses to timely and valid Objections; (6) schedule the Fairness Hearing to determine the

Final Approval of the Settlement Agreement; and (7) stay all activity in the Action except to the extent necessary to effectuate this Agreement unless and until this Agreement is terminated pursuant to its terms and conditions.

A Proposed Preliminary Approval Order is submitted herewith.

Dated: September 3, 2019

BURSOR & FISHER, P.A.

By: /s/ Scott A. Bursor
Scott A. Bursor

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